

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

JUL 2 7 2015

OFFICE OF THE SCIENCE ADVISOR



In your email message, you asked that EPA review your concerns that the Study was flawed and you also requested that the Agency stop citing the work as a basis for the carbon monoxide National Ambient Air Quality Standard (NAAQS).

The U.S. EPA Office of Inspector General (OIG) investigated your concerns, determined that they did not rise to the level of criminal charges, and referred the case to me to review the allegations for indications of a loss of scientific integrity. As the EPA Scientific Integrity Official, I am responsible for ensuring implementation of the Agency's Scientific Integrity Policy, which became effective in February 2012.

The Scientific Integrity Policy cannot be applied retroactively to actions committed before the Policy was published (i.e., before February 2012). The actions that are the basis for your concerns about the Study took place primarily in the 1980s and 1990s. Therefore, the Policy does not apply to those actions. Nevertheless, the Scientific Integrity Program did thoroughly examine your allegations. EPA also reviewed your allegations of human subjects research violations. The conclusion of both the EPA Scientific Integrity Program and the Human Subjects Research Review Program is that your allegations have no basis.

However, I do appreciate your interest in the quality of the studies that form the evidence base for EPA's reviews of the NAAQS for carbon monoxide, including the committed to ensuring that Agency decisions on the NAAQS are scientifically supported and that there is ample opportunity for public and scientific review of the evidence base, quantitative analyses and policy assessment supporting each decision. The process for the NAAQS reviews is designed to facilitate this.

In the CO NAAQS review, EPA places emphasis on studies published in peer-reviewed scientific journals; hence, you may wish to submit your evaluation of the Allred et al. (1989) study or other studies to a journal for publication. EPA's characterization of the evidence base in the next review will reflect

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assessment of all the available information and consideration of comments and advice from the Clean Air Scientific Advisory Committee and the public.

Thank you for your interest in the quality of the data that forms the basis of EPA decisions and regulations.

Sincerely

Francesca T. Guffo, Ph.D.

Scientific Integrity Official